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H. THOMAS MORAN, II, Court-Appointed
Receiver of LYDIA CAPITAL, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

THE LINCOLN NATIONAL LIFE
INSURANCE COMPANY,

Plaintiff,

v.

H. THOMAS MORAN, II, Court-Appointed
Receiver of LYDIA CAPITAL, LLC,

Defendant.

Case No. 08-CV-0023-IEG-NLS

**JOINT MOTION OF PLAINTIFF, THE
LINCOLN NATIONAL LIFE INSURANCE
COMPANY AND DEFENDANT, H.
THOMAS MORAN, II, COURT-
APPOINTED RECEIVER FOR LYDIA
CAPITAL, LLC, FOR THE EXTENSION OF
TIME TO AMEND PLEADINGS TO ADD
PARTIES**

Plaintiff, The Lincoln National Life Insurance Company ("Lincoln") and Defendant, H. Thomas Moran, II, Court-Appointed Receiver of Lydia Capital, LLC (the "Receiver"), respectfully request the Court to extend the time to amend the pleadings to add parties one (1) week, from September 15, 2008, to September 22, 2008. Lincoln and Moran jointly seek this extension of time because they are currently engaged in settlement discussions with one of the individuals whose

joinder is contemplated in this matter. These discussions potentially impact claims that Lincoln and/or Moran have or may have against this individual. Lincoln and Moran, therefore, respectfully request that the Court extend the time to add parties from September 15, 2008, to September 22, 2008.

WHEREFORE, Plaintiff, The Lincoln National Life Insurance Company and Defendant, H. Thomas Moran, II, Court-Appointed Receiver of Lydia Capital, LLC, respectfully request that the Court enter an Order granting an extension of time to amend the pleadings to add parties from September 15, 2008, to September 22, 2008.

Respectfully submitted,

s/ Jason P. Gosselin

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1 I, Shannon Emmons, am the ECF User whose identification and password are being used to file this
2 Joint Motion for Extension of Time. In compliance with Electronic Case Filing Administrative
3 Policies and Procedures Manual Section 2, f. 4., I hereby attest that Jason P. Gosselin has concurred
4 in this filing.

5 September 15, 2008

6 s/ Shannon K. Emmons

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